

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

ORDER 86-26

AMENDING NPDES PERMITS FOR THE DISCHARGERS CITED HEREIN

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter Board), finds that:

1. The entities listed below (hereinafter the dischargers) previously have been issued National Pollution Discharge Elimination System (NPDES) Permits in the following Board Orders:

Discharger	NPDES Permit No.	Order No.	Issued
Benicia, City of	CA0038091	82-26	4/21/82
Burlingame, City of	CA0037788	85-82	6/19/85
Calif. Dept. Parks and Rec. (Angel Island)	CA0037401	82-48	9/15/82
Calistoga, City of	CA0037966	84-38	7/18/84
Central Contra Costa San. Dist.	CA0037648	84-77	10/17/84
Contra Costa San. Dist. #5 (Port Costa)	CA0037885	84-49	8/15/84
Contra Costa San. Dist. #7A (Delta Diablo)	CA0038547	83-15	6/23/83
East Bay Muni. Utilities Dist. (S.D. #1)	CA0037702	84-54	9/19/84
East Bay Dischargers Authority et.al.	CA0037869	84-30	5/16/84
Edgerly Island Recla. Dist.	CA0038644	83-6	2/16/83
Hercules, City of	CA0038580	84-53	9/19/84
Las Gallinas Valley San. Dist.	CA0038751	85-45	4/30/85
Marin San. Dist. #5 (Tiburon)	CA0037753	84-70	9/6/85
Marin San. Dist. #5 (Paradise Cove)	CA0037427	82-20	4/21/82
Millbrae, City of	CA0037532	84-12	3/21/84
Mountain View San. Dist.	CA0037770	84-82	11/21/84
Napa San. Dist.	CA0037575	83-21	6/23/83
North San Mateo County San. Dist.	CA0037737	84-34	6/20/84

Discharger (continued)	NPDES Permit No.	Order No.	Issued
Novato San. Dist.	CA0037958	85-32	4/30/85
Pacifica, City of	CA0037494	84-33	6/20/84
Palo Alto, City of	CA0037834	85-19	2/20/85
Petaluma, City of	CA0037810	85-14	2/20/85
Pinole, City of	CA0037796	84-40	7/18/84
Rodeo San. Dist.	CA0037826	84-39	7/18/84
San Francisco, City of (Southeast)	CA0037664	84-27	6/20/84
San Francisco Int'l Airport (WQCP)	CA0038318	85-9	1/16/85
San Francisco Int'l Airport (Industrial WTP)	CA0028070	81-18	4/15/81
San Mateo, City of	CA0037541	84-69	10/17/84
Sausalito-Marín City San. Dist.	CA0038067	84-56	9/19/84
Seafirth Estates	CA0038393	81-36	6/17/81
Sewer Authority Mid- Coastside et.al.	CA0038598	84-59	9/19/84
Sewerage Agency of Southern Marin	CA0037711	84-55	9/19/84
Sonoma Valley County San. Dist.	CA0037800	81-45	7/15/81
South Bayside System Authority	CA0038369	84-6	1/18/84
South San Francisco and San Bruno, Cities of	CA0038130	84-13	3/21/84
St. Helena, City of	CA0038016	81-53	9/16/81
Sunnyvale, City of	CA0037621	82-37	6/16/82
U.S. Navy (Treasure Island)	CA0110116	85-61	5/15/85
West County Agency	CA0038539	82-65	12/15/82
Yountville, Town of	CA0038121	83-46	11/16/83

2. The above-cited NPDES permits contain language inconsistent with current EPA regulations on two subjects: use of the carbonaceous BOD limitation in place of biochemical oxygen demand (BOD), and average monthly (or weekly) limitations for BOD and suspended solids. The table below indicates which NPDES permits are inconsistent with EPA regulations on these two subjects:

Discharger	CBOD/BOD	Monthly Average	Weekly Average
Benicia, City of		X	X
Burlingame, City of	X		
Calif. Dept. Parks and Rec. (Angel Island)		X	X
Calistoga, City of		X	X
Central Contra Costa San. Dist.	X	X	X
Contra Costa San. Dist. #5 (Port Costa)	X	X	X
Contra Costa San. Dist. #7A (Delta Diablo)		X	X
East Bay Muni. Utilities Dist. (S.D. #1)	X	X	X
East Bay Dischargers Authority et.al.	X	X	X
Edgerly Island Recl. Dist.		X	X
Hercules, City of	X	X	X
Las Gallinas Valley San. Dist.	X		
Marin San. Dist. #5 (Tiburon)	X	X	X
Marin San. Dist. #5 (Paradise Cove)		X	X
Millbrae, City of	X	X	X
Mountain View San. Dist.	X	X	X
Napa San. Dist.		X	X
North San Mateo County San Dist.	X	X	X
Novato San. Dist.	X	X	X
Pacifica, City of	X	X	X
Palo Alto, City of			X
Petaluma, City of	X	X	X
Pinole, City of	X	X	X
Rodeo San. Dist.	X	X	X
San Francisco, City of (Southeast)	X	X	X
San Francisco Int'l Airport (WQCP)	X	X	X
San Francisco Int'l Airport (Industrial WTP)		X	
San Mateo, City of	X	X	X
Sausalito-Marín City San. Dist.	X	X	X

Discharger	CBOD/BOD	Monthly Average	Weekly Average
Seafirth Estates		X	X
Sewer Authority Mid-Coastside et.al.	X	X	X
Sewerage Agency of Southern Marin	X	X	X
Sonoma Valley County San. Dist.		X	X
South Bayside System Authority		X	X
South San Francisco and San Bruno, Cities of	X	X	X
St. Helena, City of		X	X
Sunnyvale, City of		X	
U.S. Navy (Treasure Island)	X		
West County Agency		X	X
Yountville, Town of		X	X

3. EPA's secondary treatment regulations allow publicly-owned treatment plants (POTWs) to meet either a BOD or carbonaceous BOD (CBOD) effluent limitation [40 CFR 133.102(a)]. The CBOD limitation is often preferred by POTW's that nitrify wastewater (i.e. that oxidize carbon-based as well as nitrogen-based wastes). The CBOD test inhibits the growth of nitrifying bacteria and therefore reflects only the oxygen demand due to carbonaceous waste. The CBOD limitation is somewhat more stringent than the BOD limitation (25 mg/l versus 30 mg/l, monthly average) because analyses of same waste will produce a higher value for BOD than CBOD. The above-cited NPDES permits allow POTWs to meet either limitation, rather than selecting one limitation (CBOD or BOD). This approach is inconsistent with the intent of EPA's regulations, which assumed that the choice would be made at the time of permit issuance.
4. In those NPDES permits where both the CBOD and BOD limitations appear, the Board has asked the discharger to decide which limitation is preferred. The dischargers' preferences are reflected in the proposed amendment.
5. EPA guidelines establish average monthly and weekly limitations for BOD and suspended solids discharged by POTWs [40 CFR 122.45(d)(2)]. However, the above-cited NPDES

permits establish average 30-day and 7-day limitations for these pollutants. This approach follows NPDES permit guidelines formulated by EPA. It has the effect of establishing a rolling average, which is more difficult for dischargers to monitor and comply with. In a June 28, 1985, letter to former State Board Executive Director Campos, EPA instructed the Regional Boards to use the monthly and weekly average in all NPDES permits, consistent with EPA regulations.

6. In order to correct the language in the above-cited NPDES permits, the Board must amend these permits. Because the amendments are similar and affect a particular class of discharger (POTWs discharging to surface waters), the Board is amending the NPDES permits in a single order.
7. This project is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code (CEQA) pursuant to Section 13389 of the California Water Code.
8. The Board has notified the dischargers and interested agencies and persons of its intent to amend the dischargers' NPDES Permits and has provided them with an opportunity for a public hearing and an opportunity to submit their written views and recommendations.
9. The Board, in a properly-noticed public meeting, heard and considered all comments pertaining to the dischargers.

IT IS HEREBY ORDERED, pursuant to the provisions of Division 7 of the California Water Code and regulations adopted thereunder, and to the provisions of the Clean Water Act and regulations and guidelines adopted thereunder, that the dischargers listed in Finding 1 shall comply with the following:

1. Average 30-day and 7-day limitations shall be replaced by average monthly and weekly limitations, respectively. The affected dischargers and NPDES permits are indicated in Finding 2.
2. For the following dischargers and NPDES permits, the effluent limitation for CBOD shall be deleted, leaving just the BOD limitation:

Burlingame, City of	CA0037788	85-82
Contra Costa San. Dist. #5 (Port Costa)	CA0037885	84-49
East Bay Muni. Utilities Dist. (S.D. #1)	CA0037702	84-54
Hercules, City of	CA0038580	84-53
Las Gallinas Valley San. Dist.	CA0037851	85-45
Marin San. Dist. #5 (Tiburon)	CA0037753	84-70
Millbrae, City of	CA0037532	84-12
Mountain View San. Dist.	CA0037770	84-82
Novato San. Dist.	CA0037958	85-32
Petaluma, City of	CA0037810	85-14
Pinole, City of	CA0037796	84-40
Rodeo San. Dist.	CA0037826	84-39
San Francisco, City of (Southeast)	CA0037664	84-27
San Mateo, City of	CA0037541	84-69
Sausalito-Marín City San. Dist.	CA0038067	84-56
Sewer Authority Mid-Coastside et.al.	CA0038598	84-59
Sewerage Agency of Southern Marin	CA0037711	84-55
South San Francisco and San Bruno,		
Cities of	CA0038130	84-13
U.S. Navy (Treasure Island)	CA0110116	85-61

3. For the following dischargers and NPDES permits, the effluent limitation for BOD shall be deleted, leaving just the CBOD limitation:

Central Contra Costa San Dist.	CA0037648	84-77
East Bay Dischargers Authority et.al.	CA0037869	84-30
North San Mateo County San. Dist.	CA0037737	84-34
San Francisco Int'l Airport (WQCP)	CA0038318	85-9
Pacifica, City of	CA0037494	84-33

4. This Order shall serve to amend the National Pollutant Discharge Elimination System Permits listed above pursuant to Section 402 of the Clean Water Act and shall become effective 10 days after date of its adoption provided the Regional Administrator, Environmental Protection Agency, has no objection. If the Regional Administrator objects to its issuance, the permit shall not become effective until such objection is withdrawn.

5. This Order expires on April 16, 1991.

I, Roger B. James, Executive Officer, do hereby certify the foregoing is a full true, and correct copy of an order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on April 16, 1986.

  
 ROGER B. JAMES  
 Executive Officer